

March 2, 2009

Mr. Steve Odil, P.E.  
Municipal Solid Waste Permits Section  
Waste Permit Division  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, TX 78711-3087

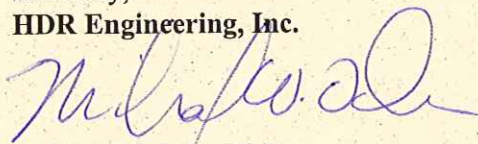
RE: Rock Prairie Road Landfill - Brazos County  
Municipal Solid Waste - Permit No. 1444C  
Permit Modification – Ten-Foot Height Increase – Notice of Deficiency (NOD)  
Tracking No. 12520156  
RN100830090/CN600340194

Dear Mr. Odil:

We have prepared the attached responses to your technical notice of deficiency dated February 18, 2009 for the Rock Prairie Road Landfill Permit Modification application for a ten-foot height increase to improve drainage. For convenience, the attached contains a copy of the original comments followed by our responses. Also attached are one original, two unmarked copies, and one marked copy in redline/strikeout format per your request. An additional unmarked copy is being sent to Frank Burleson, Waste Section Manager for the Texas Commission on Environmental Quality Region 9. In accordance with 30 TAC §305.44, an original certification statement is included.

If you have any further questions, please feel free to contact me at (214) 733-5911.

Sincerely,  
**HDR Engineering, Inc.**



Michael W. Oden, P.E.  
Project Manager  
Enclosures

CC: Mr. Pete Caler – BVSWM  
Ms. Samantha Best – BVSWM  
Ms. Linda Huff – City of Bryan  
Mr. Jay Marcotte – City of Bryan  
Mr. Frank Burleson – TCEQ Waco

This document is a response to the technical notice of deficiency for the Modification to Permit No. MSW 1444C as provided by the Texas Commission on Environmental Quality to BVSWMMA on February 18, 2009. The original comments are included below, and the responses to these comments are indicated in **bold** text.

1. Item 1 of the NOD requested an updated landowner map and list in accordance with §330.59(c)(3), including mineral interest ownership under the facility. The response cover letter clarifies that the Brazorian County Appraisal District does not keep these records for this site. Please provide a notation on the landowner list to that effect.

**Response:** The landowner list has been updated with information noting that the Brazos County Appraisal District does not keep records of mineral interest ownership unless there is mineral production. There is no mineral production at the site; therefore, no records are available from the real property appraisal records as noted in 30 TAC §330.59(c)(3)(B).

2. Item 2 of the NOD requested clarification regarding areas that do not have Subtitle D liners where the final cover elevation will increase. The Site Operating Plan (SOP) and Figure ATT III.1.1 now indicate that these areas will be filled with inert material. To prevent the spread of leachate from new putrescible waste from reaching pre-Subtitle D cells, please establish a buffer zone between the Subtitle D and pre-Subtitle D areas. The buffer should begin above the Subtitle D/pre-Subtitle D boundary at the elevations currently permitted (i.e., before consideration of this ten-foot height increase modification request) and sloping 45 degrees outward from the pre-Subtitle D area. Please clarify this on Figure ATT III.1.1 and within the SOP.

**Response:** A revised Figure ATT III.1.1 is attached along with the revised page 37 of the Site Operating Plan (SOP). Also included is a revised Table 2.1 from Part III indicating the additional inert material that would be required to accommodate the required buffer.

## **END OF RESPONSES**



Signature Page

I, PETE CALER  
(Operator)

BKVMA EXECUTIVE DIRECTOR  
(Title)

certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: [Signature]

Date: 2 MAR 09

-----  
TO BE COMPLETED BY THE OPERATOR IF THE APPLICATION IS SIGNED BY AN AUTHORIZED REPRESENTATIVE FOR THE OPERATOR

I, \_\_\_\_\_, hereby designate \_\_\_\_\_  
(Print or Type Operator Name) (Print or Type Representative Name)

as my representative and hereby authorize said representative to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Commission on Environmental Quality in conjunction with this request for a Texas Water Code or Texas Solid Waste Disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my authorized representative in support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.

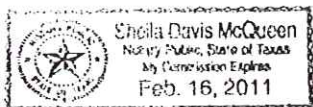
\_\_\_\_\_  
Printed or Typed Name of Operator or Principal Executive Officer

\_\_\_\_\_  
Signature

-----  
SUBSCRIBED AND SWORN to before me by the said Pete Caler

On this 2nd day of March, 2009

My commission expires on the Feb. 16th day of 2011



Sheila McQueen  
Notary Public in and for

Brazos County, Texas

(Note: Application Must Bear Signature & Seal of Notary Public)

**BVSWMA Rock Prairie Road Landfill**  
**Property Owners and Mineral Interest Owners as of May 2008**

**Property Owners within 500'**

Map Ref	Acres	ID	Owner's Name & Address
A	7.17 68.00	R10579 R10578	BVSWMA P.O. Box 9960 College Station, TX 77842
B	384.19 6.70	R10581 R88895	City of College Station P.O. Box 9973 College Station, TX 77842
C	258.21	R88855	Pebble Creek Country Club, Inc. c/o Pebble Creek Development Company 4500 Pebble Creek Pkwy College Station, TX 77845
D	8.10	R88856	Pebble Creek Development Company c/o Young Brothers PO Drawer 1800 Waco, TX 76703
E	68.56	R10644	City of College Station P.O. Box 9973 College Station, TX 77842
F	0.56	R88864	Charles L. Brenton III Terri Bond Brenton 1111 12 <sup>th</sup> Man Circle College Station, TX 77845
G	10.00 2.35	R10703 R10704	Kay H. Durr 10 Overlook Ct. Hampton, VA 23669
H	3.37	R10685	Nita M. Holliday 7003 Rock Prairie Road College Station, TX 77845
I	0.35	R88865	William L. & Katherine E. Mies 1109 12 <sup>th</sup> Man Circle College Station, TX 77845-8979

Map Ref	Acres	ID	Owner's Name & Address
J	66.39 8.61 28.61 49.44	R10591 R10592 R303078 R10665	Dolly Olden/Arthur D. Olden Family Trust 7804 Rock Prairie Road, E College Station, TX 77845
K	76.0	R10603	City of College Station P.O. Box 9973 College Station, TX 77842
L	44.0	R10604	College Station ISD 1812 Welsh Ave. #120 College Station, TX 77840
M	1.41	R10702	Roger Pompa 11515 Sageperry Drive Houston, TX 77089
N	5.01	R10593	Cutting Edge Self-Storage ADT, LC 5630 S Waterbury Way Ste #B-101 Murray, UT 84121

### Mineral Interest Owners

**Note:**

The Brazos County Appraisal District does not keep records of the mineral interest ownership unless there is mineral production. There is no mineral production at the landfill site; therefore, no records are available from the real property appraisal records as noted in 30 TAC §330.59 (c)(3)(B).

**PART III**

**BRAZOS VALLEY SOLID WASTE MANAGEMENT AGENCY  
(BVSWMA)  
(APPLICANT)**

**ROCK PRAIRIE ROAD LANDFILL  
(PROJECT)**

**PERMIT – No. MSW 1444C**

**COLLEGE STATION, TEXAS  
BRAZOS COUNTY, TEXAS  
(LOCATION)**

**Permit Issued November 25, 2002**

**Revised March 2009**

*3-2-2009*

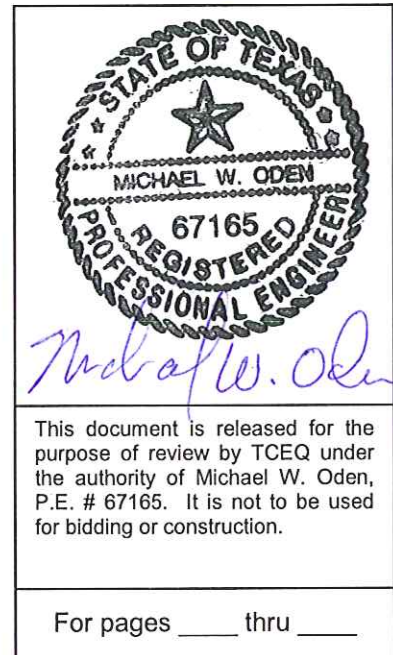




Figure III.Att.1.1). See Table 2.2 for a detail of the remaining volume.

Actual quantities accepted at the site will vary depending on the number of cities sending waste to the facility, changes in population or economic activity, and changes in waste collection and disposal practices by private haulers using the facility.

**TABLE 2.1**  
**LATERAL EXPANSION AREA**  
**ROCK PRAIRIE ROAD LANDFILL**  
**SOLID WASTE DEPOSITION PROJECTION**

Date	Daily	Yearly	Yearly Volume (waste plus soil)	Cum. Volume (waste plus soil)
Thru Sept.	Tonnage	Tonnage	(cy)	(cy)
2008	960	297,600	515,100	515,100
2009	976	302,659	523,900	1,039,000
2010	993	307,804	532,806	1,571,800

1.7 % annual growth rate assumed

**TABLE 2.2**  
**ROCK PRAIRIE ROAD LANDFILL**  
**REMAINING SITE LIFE AND SOIL BALANCE**

<b>Item</b>	
Site Airspace	
Waste Area (acre) <sup>1</sup>	48.0
Waste Area (SF)	2,090,880
Gross Volume (CY) <sup>3</sup>	1,854,400
3.5' Final Cover Material (CY)	271,000
4' Bottom Liner Material (CY) <sup>2</sup>	0
Net Landfill Volume (CY)	1,583,400
Inert Fill Volume (CY)	36,700
MSW Fill Volume (CY)	1,546,700
Site Life	
Daily Cover @ 11% (CY)	170,800
Net Solid Waste Volume (CY)	1,381,500
Site Life (YR)	2.7
Soil Balance	
Excavation (CY)	0
Liner System (CY)	170,800
Daily Cover (CY)	0
Structural Fill (CY)	271,000
Soil Balance (CY) <sup>4</sup>	<441,800>

1 Area Remaining to accept waste.

2 All liner has been constructed.

3 Computed as of September 2007 and includes 2008 modification.

4 Soil to be obtained from off site sources.









**PART IV SITE OPERATING PLAN**

§330.65

**BRAZOS VALLEY SOLID WASTE MANAGEMENT AGENCY  
(BVSWMA)**

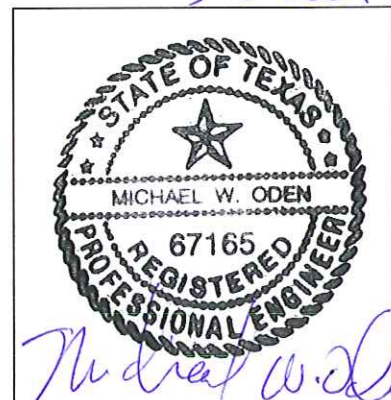
**ROCK PRAIRIE ROAD LANDFILL**

**PERMIT – No. 1444C  
ISSUED NOVEMBER 25, 2002**

**COLLEGE STATION, TEXAS  
BRAZOS COUNTY, TEXAS**

**REVISION 8**

**March 2009**



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For pages \_\_\_\_ thru \_\_\_\_

## 5.0 SEQUENCE OF DEVELOPMENT

Since the Rock Prairie Road Landfill is an existing permitted solid waste facility, many of the required site features are already in place. The site gatehouse, site entrance road, and fence around the property are currently in place. Both existing and proposed features are shown in Part III, Attachment 1. All fill sectors have been constructed and are closed or have remaining fill space.

The leachate sump riser of Phase I will remain in service without modification until filling begins in the upper lifts of Sector 17. Prior to filling in Sector 17 upper lifts, the Sector I leachate sump riser will be extended vertically or by an alternate design to provide continuous use of the Phase I sump.

The proposed fill sequence is depicted in Part III, Attachment 1. Operations will generally follow the proposed fill sequence. If it becomes necessary to deviate from the proposed sequence of fill, the TCEQ will first be consulted.

### 5.1 2008 Final Contour Modification

To improve the drainage at the facility the final contours were modified in 2008 at the west end of the landfill. In areas that have a liner system that does not meet the Subtitle D criteria, only inert materials or additional top soil will be placed to achieve the contours on Figure No. III.Att.1.1. Additionally, a 10-foot buffer of inert material will be placed between the line demarking the pre- and post- Subtitle D liner areas and any new MSW placed to the modified contours. Inert material will be placed before construction of the final cover and can be natural or man-made, non-putrescible, non-hazardous materials including, but not limited to, soil, dirt, sand, clay, gravel, brick, glass, concrete with reinforcing steel and rock. Tires that have been split, quartered, or shredded may be placed in these areas. Additional topsoil will be used as part of the final cover system as needed to achieve final contours. These materials will be placed in the cross hatched areas on the above referenced Figure. Approximately 36,700 cubic yards of the 193,100 cubic yards of increased capacity are available in these areas.



*Michael W. Oden*  
Page 37  
3-2-2009



**PART III**

**BRAZOS VALLEY SOLID WASTE MANAGEMENT AGENCY**

**(BVSWMMA)**

**(APPLICANT)**

**ROCK PRAIRIE ROAD LANDFILL**

**(PROJECT)**

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**Revised ~~October 2008~~**

**March 2009**

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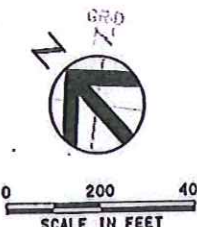
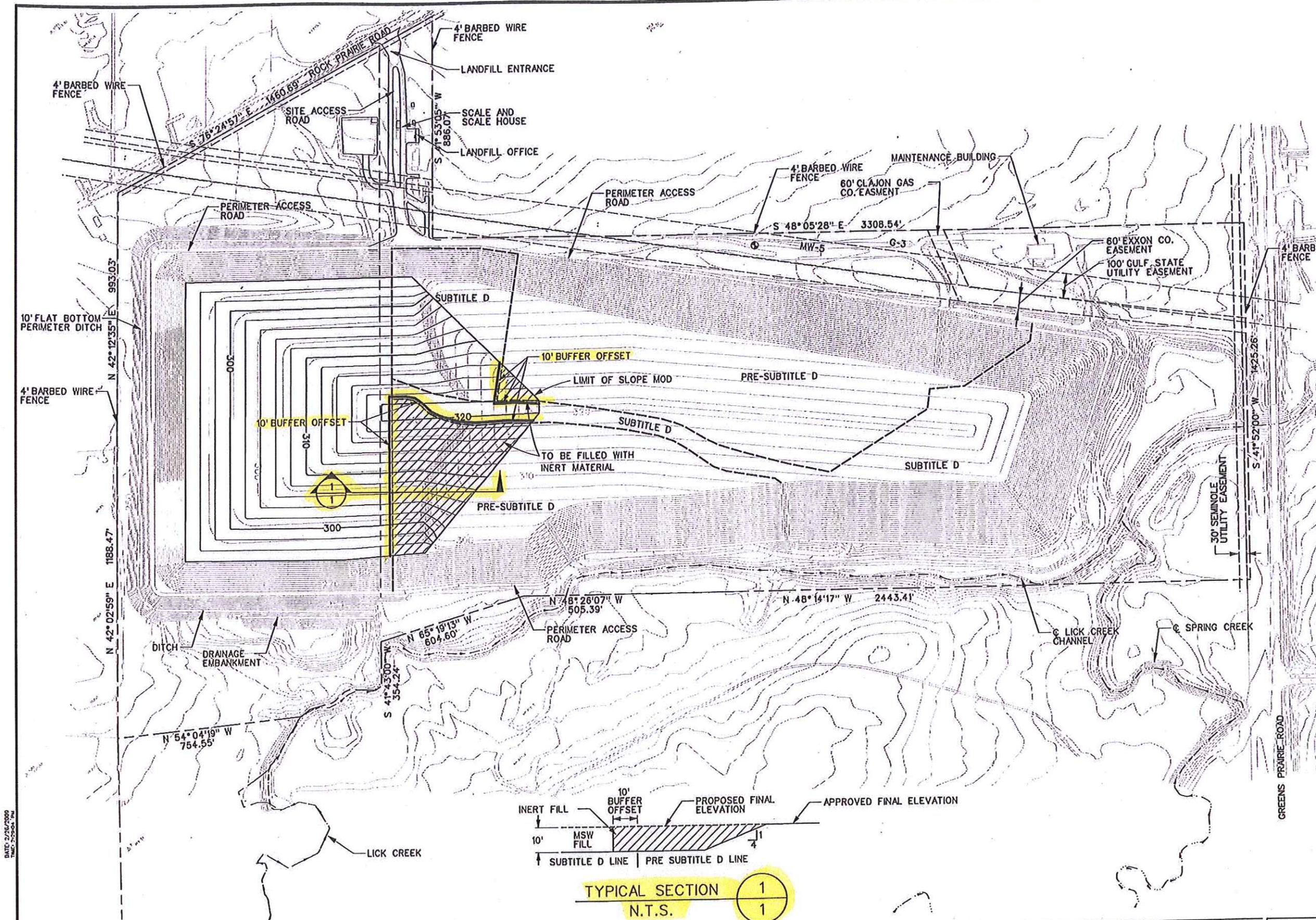
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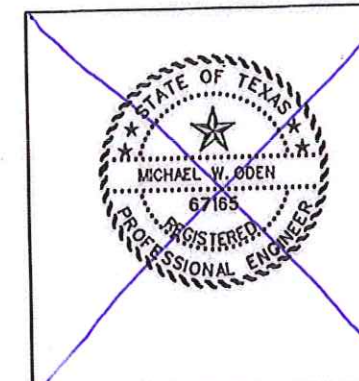




# LEGEND

- PERMIT BOUNDARY
- EXISTING ELEVATION
- EXISTING CONTOUR
- LIMITS OF EASEMENT
- SITE COORDINATE GRID LINE/TICK
- EXISTING MONITOR WELL
- LANDFILL GAS PROBE
- BENCHMARK CONCRETE MONUMENT  
N 10157.11  
E 11487.59  
EL. 253.87
- FILL OVER PRE-SUBTITLE D LINER AREAS. SEE NOTE.

- NOTES:**
- EXISTING CONTOURS COMPILED FROM AERIAL SURVEY PROVIDED BY DALLAS AERIAL SURVEY, INC. IN SEPTEMBER, 2002.
  - ELEVATIONS ARE BASED ON NGVD 1929.
  - FILL ABOVE CONTOURS APPROVED IN 2002 IN AREAS WITH A PRE-SUBTITLE D LINER WILL BE FILLED WITH INERT MATERIAL.



## SITE LAYOUT PLAN

**HDR**

HDR Engineering, Inc.  
17111 Preston Road  
Suite 200  
Dallas, Texas 75248

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Revision No.	Description	Date	Drawn	Chd.	Resp. Eng.	Proj. Mgr.
2	RESPONSE TO COMMENTS	10/08				
1	2008 FINAL CONTOUR MODIFICATION	08/08				

Project Manager	M. ODEN
Architect	
Civil	M. ODEN
Electrical	
Designed	B. COX
Drawn By	B. COX

**BVSWM**

BRAZOS VALLEY SOLID WASTE MANAGEMENT AGENCY

ROCK PRAIRIE ROAD LANDFILL - MSW 1444C  
COLLEGE STATION, TEXAS

Date	AUG., 2008	Project No.	85694	Figure No.	ATT III.1.1	Issue	
Scale	AS SHOWN						



**PART IV SITE OPERATING PLAN**

§330.65

**BRAZOS VALLEY SOLID WASTE MANAGEMENT AGENCY  
(BVSWMMA)**

**ROCK PRAIRIE ROAD LANDFILL**

**PERMIT – No. 1444C**

**ISSUED NOVEMBER 25, 2002**

**COLLEGE STATION, TEXAS  
BRAZOS COUNTY, TEXAS**

**REVISION 87**

**-October 2008 March 2009**

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